

**In the United States District Court  
For the Northern District of Texas  
Fort Worth Division**

**Darla Strange and Tim Strange,  
Individually and as Next Friend of CS, a  
minor; Tisha Zuniga, Individually and as  
Next Friend of AZ, a minor; and Michelle  
Miller, Individually and as Next Friend of  
KM, a minor**

**Civil Action No. 4:18-cv-00101-O**

**Vs.  
Mansfield Independent School District and  
Kelly Dan Williams, Jr., Individually, and as  
an Employee of Mansfield Independent  
School District**

**Plaintiffs' Designation Of Expert Witnesses and Supplemental Rule 26(a)(i) Disclosures**

Plaintiffs, Darla Strange and Tim Strange, Individually and as Next Friend of CS, a minor; Tisha Zuniga, Individually and as Next Friend of AZ, a minor; and Michelle Miller, Individually and as Next Friend of KM, a minor file this Designation of Expert Witnesses and Supplemental Rule 26(a)(i) Disclosures and in supplementation of all prior discovery requests requesting identification of experts, as shown on the attached Exhibit "A," subject to the following:

**I.**

Plaintiffs reserve the right to supplement this designation with additional designations of experts within the time limits imposed by the Court or any alterations of same by subsequent Court Order or agreement of the parties, or pursuant to the Federal Rules of Civil Procedure and/or the Federal Rules of Civil Evidence.

**II.**

Plaintiffs reserve the right to elicit, by way of cross-examination, opinion testimony from experts designated and called by other parties to the suit. Plaintiffs express their intention to

possibly call, as witnesses associated with adverse parties, any of Defendant's experts.

III.

Plaintiffs reserve the right to call undesignated rebuttal expert witnesses whose testimony cannot reasonably be foreseen until the presentation of the evidence against Plaintiffs.

IV.

Plaintiffs reserve the right to withdraw the designation of any expert and to aver positively that any such previously designated expert will not be called as a witness at trial, and to re-designate same as a consulting expert, who cannot be called by opposing counsel.

V.

Plaintiffs reserve the right to elicit any expert opinion or lay opinion testimony at the time of trial which would be truthful, which would be of benefit to the jury to determine material issues of fact, and which would not be violative of any existing Court Order or the Federal Rules of Civil Procedure.

VI.

Plaintiffs hereby designate, as adverse parties, potentially adverse parties, and/or as witnesses associated with adverse parties, all parties to this suit and all experts designated by any party to this suit, even if the designating party is not a party to the suit at the time of trial. In the event a present or future party designates an expert but then is dismissed for any reason from the suit or fails to call any designated expert, Plaintiffs reserve the right to designate and/or call any such party or any such experts previously designated by any party.

VII.

Plaintiffs reserve whatever additional rights he might have with regard to experts, pursuant to the Federal Rules of Civil Procedure, the Federal Rules of Civil Evidence, the case law construing same, and the rulings of the trial court.

Respectfully submitted,

**VB Attorneys**

*/s/ Byron C. Alfred*

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**Byron C. Alfred**

SBN: 24084507

**Brian Beckcom**

SBN: 24012268

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Houston, Texas 77057

Office: (713) 224-7800

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Email: Byron@vbattorneys.com

Brian@vbattorneys.com

**Attorneys for Plaintiffs**

**Certificate of Service**

The undersigned authority hereby certifies that a true and correct copy of the foregoing instrument has been served upon all counsel of record pursuant to the FRCP, on this the 18th day of March, 2019.

*/s/ Byron C. Alfred*

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**Byron C. Alfred**

**In the United States District Court  
For the Northern District of Texas  
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**Darla Strange and Tim Strange,  
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Next Friend of AZ, a minor; and Michelle  
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**Civil Action No. 4:18-cv-00101-O**

**Vs.  
Mansfield Independent School District and  
Kelly Dan Williams, Jr., Individually, and as  
an Employee of Mansfield Independent  
School District**

**Plaintiffs' Fact and Expert Witness List**

Darla Strange and Tim Strange, Individually and as Next Friend of CS, a minor; Tisha Zuniga, Individually and as Next Friend of AZ, a minor; and Michelle Miller, Individually and as Next Friend of KM

% Byron C. Alfred

Brian Beckcom

VB Attorneys

6363 Woodway, Suite 400

Houston, Texas 77057

*Plaintiffs / Darla Strange and Tim Strange, Individually and as Next Friend of CS, a minor; Tisha Zuniga, Individually and as Next Friend of AZ, a minor; and Michelle Miller, Individually and as Next Friend of KM are Plaintiffs in this matter, and have information and knowledge about the incident made the basis of this lawsuit.*

Representatives, employees, and custodians of:

Mansfield Independent School District, including but not limited to

Chief Jimmy Womack - Chief MISD Police Department

Duane Thurston - Principal Mary Orr Intermediate School

Jamie Warren - Special Education Teacher

Detective Leddy Fowler - Detective MISD Police Department

Lee Schellinbarger - Detective MISD Police Department

Lorena Alvarenga - Custodian MISD

Venetia Sneed - Director of Human Resources at MISD

Aurora Garcia - Human Resources assistant

Sergeant Robert Wood - MISD Police Officer

Dr. Kimberly Cantu - Associate Superintendent of Human Resources  
Dr. Jim Vaszauskas - Superintendent MISD  
Patricia Tally - Paraprofessional at MISD  
Sondra Thomas  
Michelle Long  
Stephanie Couch - Campus Secretary  
Christine Englert - MISD IEP (ARD) Committee - Administrator, LEA Representative  
Joe Stivers - MISD IEP (ARD) Committee - General Education Teacher  
Amy Skipper - MISD IEP (ARD) Committee - Speech Therapist  
Joane Brown - MISD IEP (ARD) Committee - Diagnostician  
Kimberly Dennis - MISD IEP (ARD) Committee - Occupational Therapist  
Carla Egyed - MISD IEP (ARD) Committee - LSSP  
Rob Balentine - MISD IEP (ARD) Committee - Administrator  
Christi Powell - MISD IEP (ARD) Committee - General Education Teacher  
Dana Beal - MISD IEP (ARD) Committee - Adapted P.E. Teacher  
Jessica Fincher - MISD IEP (ARD) Committee - General Education Teacher  
James Czerwinski - MISD IEP (ARD) Committee - Special Education Teacher - Life Skills  
Myatt - MISD IEP (ARD) Committee - Special Education Teacher - Life Skills  
% Thomas J. Fisher  
Leasor Crass, P.C.  
302 W. Broad Street  
Mansfield, Texas 76063

*Defendant / Mansfield Independent School District's representatives and/or employees who may have knowledge of the incident made the basis of this lawsuit, and of the damages sustained as a result of their respective incidents wherein they were molested by Defendant Kelly Dan Williams, Jr.*

Kelly Dan Williams  
Reg. No. 49667-117  
United States Penitentiary, Tucson  
P.O. Box 24550  
Tucson, Arizona 85734

*Pro Se Defendant / Kelly Dan Williams is a Defendant in this matter, and has knowledge of the incidents made the basis of this lawsuit.*

Representatives, employees, and custodians of:  
Mansfield Independent School District Police Department  
1522 N. Walnut Creek Drive  
Mansfield, Texas 76063  
817-299-6000

*Mansfield ISD Police Department arrested and investigated Mr. Kelly Dan Williams, and have knowledge of the incident(s) made the basis of this lawsuit.*

Representatives, employees, and custodians of:

Arlington Alliance For Children

1320 West Abram

Arlington, TX 76013

*Arlington Alliance For Children conducted forensic interview of the minor(s) involved in this matter, and have knowledge of the incident(s) made the basis of this lawsuit.*

Representatives, employees, and custodians of:

Della Icenhower Intermediate

8100 Webb Ferrell Road

Arlington, Texas 76002

817-299-2700

*Plaintiff AZ, Minor attended school at Della Icenhower Intermediate. Della Icenhower Intermediate's representatives and/or employees may have knowledge of the incident(s) made the basis of this lawsuit.*

DeRhonda Waller - Former Contract Nurse - Maxim Staffing Solutions

Address Unknown

Knowledge of Kelly Williams conduct in classroom during time they worked together.

Gerald Kokenes - Former Principal Cross Timbers Intermediate School

2022 Fawnhollow Court

Arlington, TX 76001

Knowledge of parent contact in 2010, nature of the information received and District response to the contact

Malika Garner - Former substitute teacher MISD

1302 Cloyne Drive

Arlington, TX 76002

Knowledge of Kelly Williams conduct in classroom during time they worked together

James E. Czerwinski

113 Yosemite

Mansfield, TX 76063

817-521-2529

*Former substitute teacher at Mary Orr Intermediate; Knowledge of Kelly Williams conduct in classroom during time they worked together*

Leigh Smith

Address Unknown

Knowledge of transfer of Kelly Williams from Della Icenhower Intermediate School

Rodney McHenry  
8105 Mosstree Drive  
Arlington, TX 76001

Knowledge of hiring process and certification confirmation for Kelly Williams

Carmelynn Bragiel - Director of Special Education  
1417 Danbury Drive  
Mansfield, TX 76063

Knowledge of Kelly Williams' employment with MISD, the lack of any claims of abuse or other inappropriate behavior by Mr. Williams, the incident on June 1, 2105 and subsequent investigation and action taken by MISD.

Karen Wentworth - Associate Superintendent of Human Resources  
P.O. Box 470516  
Fort Worth, TX 76147

Knowledge of investigation by and subsequent action taken by MISD in response to the incident of June 1, 2105 and the lack of prior claims of abuse or other inappropriate behavior by Mr. Williams

Alexis McClendon - Certification Officer  
3235 Porma  
Grand Prairie, TX 76002  
Knowledge of Kelly Williams hiring process

Ronnie Moss - Cedar Hill ISD

Jim Bergatrum - Cedar Hill ISD

Nuria Lozano  
823 Sunview Court  
Arlington, TX 76001  
817-885-9252

*Minor AG is a former student of Kelly Dan Williams; identified on Mansfield ISD Investigative Report.*

Ronald Smith  
607 Parkhill  
Mansfield, TX 76063

*Minor BJ is a former student of Kelly Dan Williams; identified on Mansfield ISD Investigative Report.*

Helen Stewart  
443 Everest Drive  
Cedar Hill, TX 75104  
972-291-8172

*Minor MS is a former student of Kelly Dan Williams; identified on Mansfield ISD Investigative Report.*

Amy and Steven Johnson  
2633 Evening Shade  
Ft. Worth, TX 76131  
817-657-7019

*Minor CJ is a former student of Kelly Dan Williams; identified on Mansfield ISD Investigative Report.*

Janet Torralba

*Minor JT is a former student of Kelly Dan Williams; identified on Mansfield ISD Investigative Report.*

Cook's Children Medical Center  
Jamye Coffman, MD  
Theresa Fugate, RN CA-CP SANE  
801 7th Ave, Fort Worth, TX 76104  
682-885-3953

*Plaintiffs' KM, Minor and CS, Minor's healthcare provider.*

Any and all experts designated by any party.

Any individual identified in the discovery process herein having knowledge of relevant facts.  
Any IME physician designated by Defendants.

All medical and/or dental care providers above will testify regarding matters contained in their records and depositions. Their observations, diagnosis, opinions, prognosis, facts, physical and clinical examinations, and tests done, reviewed or relied upon are incorporated herein by reference. This includes opinions regarding Plaintiff's pain, mental anguish, medical care, medical expenses, limitations, disfigurement, physical impairment, wage earning capacity, surgery, or any other medical issue in this case. The medical care providers may also testify regarding the reasonableness and necessity of the medical charges and treatment and they may authenticate the medical charges.

The Custodians of Records will authenticate the records and/or may testify regarding the reasonableness and necessity of the medical charges.

Plaintiff reserves the right to call any of the following witnesses or experts who may have knowledge of relevant facts:

- a) Any witness or expert which has been or will be named by any other party in any answer to Interrogatory, even if the party which designated the witness or expert is no longer a party to the lawsuit at the time of trial;
- b) Any witness or expert whose name appears on any document which has been or will be produced by any party in any response to Requests for Production;
- c) Any witness or expert whose name is reflected in any document which has been or will be obtained through the use of medical authorizations;
- d) Any witness or expert whose name is reflected in any document which has been or will be submitted to the Court by Affidavit;
- e) Any witness or expert whose name is reflected in any document which has been or



- will be subpoenaed by any party;
- f) Any witness or expert whose name appears in the transcript of any deposition taken in this matter; and
- g) Any witness or expert whose name is reflected in any document which has been or will be attached to the transcript of any deposition.

The descriptions provided below each retained expert's name are not intended to be an exhaustive list of the areas to be addressed by the expert. Likewise, the listing of documents or materials reviewed by any expert are not necessarily a complete listing of the materials contained within the expert's file. Rather, this information is being furnished to provide opposing counsel with an indication of the general areas that the expert will address and to provide guidance on the types of information or materials that the expert has or will review in connection with his/her work in this case.

**Non-Retained Testifying Experts**

**Darla Strange**  
**Plaintiff CS's Mother**  
**% Byron C. Alfred**  
**Brian Beckcom**  
**VB Attorneys**  
**6363 Woodway, Suite 400**  
**Houston, Texas 77057**

This witness has specialized knowledge regarding the pre and post-incident behavioral and emotional condition of Plaintiff CS. This witness is expected to testify that Defendant Kelly Williams' molestation of Plaintiff CS has caused emotional and behavioral changes that have detrimentally affected his development and overall enjoyment of life.

**Tim Strange**  
**Plaintiff CS's Father**  
**% Byron C. Alfred**  
**Brian Beckcom**  
**VB Attorneys**  
**6363 Woodway, Suite 400**  
**Houston, Texas 77057**

This witness has specialized knowledge regarding the pre and post-incident behavioral and emotional condition of Plaintiff CS. This witness is expected to testify that Defendant Kelly Williams' molestation of Plaintiff CS has caused emotional and behavioral changes that have detrimentally affected his development and overall enjoyment of life.

**Tisha Zuniga**  
**Plaintiff AZ's Mother**  
**% Byron C. Alfred**  
**Brian Beckcom**  
**VB Attorneys**  
**6363 Woodway, Suite 400**  
**Houston, Texas 77057**

This witness has specialized knowledge regarding the pre and post-incident behavioral and emotional condition of Plaintiff AZ. This witness is expected to testify that Defendant Kelly Williams' molestation of Plaintiff AZ has caused emotional and behavioral changes that have detrimentally affected his development and overall enjoyment of life.

**Michelle Miller**  
**Plaintiff KM's Mother**  
**% Byron C. Alfred**  
**Brian Beckcom**  
**VB Attorneys**  
**6363 Woodway, Suite 400**  
**Houston, Texas 77057**

This witness has specialized knowledge regarding the pre and post-incident behavioral and emotional condition of Plaintiff KM. This witness is expected to testify that Defendant Kelly Williams' molestation of Plaintiff KM has caused emotional and behavioral changes that have detrimentally affected his development and overall enjoyment of life.

**Huguley Psychotherapy Clinic, Inc.**  
**Kristina Hicks, LPC**  
**214 N. Caddo Street**  
**Cleburne, Texas 76031**  
**817-558-2988**  
***Plaintiff KM, Minor's healthcare provider.***

This witness is qualified psychological expert and treating medical provider of Plaintiff KM. This witness is expected to testify that, based on reasonable psychological probability, Defendant Kelly Williams Jr.'s molestation of Plaintiff KM has caused permanent emotional and psychological trauma that has detrimentally affected his development and overall enjoyment of life. This witness is also expected to testify that, based on reasonable psychological probability, the aforementioned molestation will continue to detrimentally affect Plaintiff KM's development and overall enjoyment of life into the future. This witness will also testify as to the future care plan and costs associated with the damages caused by the Defendant Kelly Williams's molestation of Plaintiff KM. This witness may also testify as to the usual and customary changes associated with children with special needs that have been molested.

**Ricardo Schack, M.D.**  
**175 Sagebrush Lane**  
**Waxahachie, Texas 75165**  
**972-923-0281**  
***Plaintiff KM, Minor's healthcare provider.***

This witness is qualified psychological expert and treating medical provider of Plaintiff KM. This witness is expected to testify that, based on reasonable psychological probability, Defendant Kelly Williams Jr.'s molestation of Plaintiff KM has caused permanent emotional and psychological

trauma that has detrimentally affected his development and overall enjoyment of life. This witness is also expected to testify that, based on reasonable psychological probability, the aforementioned molestation will continue to detrimentally affect Plaintiff KM's development and overall enjoyment of life into the future. This witness will also testify as to the future care plan and costs associated with the damages caused by the Defendant Kelly Williams's molestation of Plaintiff KM. This witness may also testify as to the usual and customary changes associated with children with special needs that have been molested.

**Raj Shiwach, M.D. Psychiatrist**

**941 York Drive**

**DeSoto, TX 75115**

**817-453-5437**

***Plaintiff KM, Minor's healthcare provider.***

This witness is qualified psychological expert and treating medical provider of Plaintiff KM. This witness is expected to testify that, based on reasonable psychological probability, Defendant Kelly Williams Jr.'s molestation of Plaintiff KM has caused permanent emotional and psychological trauma that has detrimentally affected his development and overall enjoyment of life. This witness is also expected to testify that, based on reasonable psychological probability, the aforementioned molestation will continue to detrimentally affect Plaintiff KM's development and overall enjoyment of life into the future. This witness will also testify as to the future care plan and costs associated with the damages caused by the Defendant Kelly Williams's molestation of Plaintiff KM. This witness may also testify as to the usual and customary changes associated with children with special needs that have been molested.

**Dr. Anita Patel**

**Lake Ray Hubbard Pediatrics**

**757 E US Highway 80 Ste 200**

**Forney, TX 75126**

**972-646-3346**

***Plaintiff CS, Minor's healthcare provider.***

This witness is qualified psychological expert and treating medical provider of Plaintiff CS. This witness is expected to testify that, based on reasonable psychological probability, Defendant Kelly Williams Jr.'s molestation of Plaintiff CS has caused permanent emotional and psychological trauma that has detrimentally affected his development and overall enjoyment of life. This witness is also expected to testify that, based on reasonable psychological probability, the aforementioned molestation will continue to detrimentally affect Plaintiff CS's development and overall enjoyment of life into the future. This witness will also testify as to the future care plan and costs associated with the damages caused by the Defendant Kelly Williams's molestation of Plaintiff CS. This witness

may also testify as to the usual and customary changes associated with children with special needs that have been molested.

**Elk Grove Pediatrics**

**9727 Elk Grove-Florin Rd., Ste. 250**

**Elk Grove, Ca 95624**

**916-686-5003**

***Plaintiff AZ, Minor's healthcare provider.***

This witness is qualified psychological expert and treating medical provider of Plaintiff AZ. This witness is expected to testify that, based on reasonable psychological probability, Defendant Kelly Williams Jr.'s molestation of Plaintiff AZ has caused permanent emotional and psychological trauma that has detrimentally affected his development and overall enjoyment of life. This witness is also expected to testify that, based on reasonable psychological probability, the aforementioned molestation will continue to detrimentally affect Plaintiff AZ's development and overall enjoyment of life into the future. This witness will also testify as to the future care plan and costs associated with the damages caused by the Defendant Kelly Williams's molestation of Plaintiff AZ. This witness may also testify as to the usual and customary changes associated with children with special needs that have been molested.

**Children Pediatrics**

**2425 Stockton Blvd**

**Sacramento, Ca 95817**

***Plaintiff AZ, Minor's healthcare provider.***

This witness is qualified psychological expert and treating medical provider of Plaintiff AZ. This witness is expected to testify that, based on reasonable psychological probability, Defendant Kelly Williams Jr.'s molestation of Plaintiff AZ has caused permanent emotional and psychological trauma that has detrimentally affected his development and overall enjoyment of life. This witness is also expected to testify that, based on reasonable psychological probability, the aforementioned molestation will continue to detrimentally affect Plaintiff AZ's development and overall enjoyment of life into the future. This witness will also testify as to the future care plan and costs associated with the damages caused by the Defendant Kelly Williams's molestation of Plaintiff AZ. This witness may also testify as to the usual and customary changes associated with children with special needs that have been molested.

**Kaiser Permanente  
South Medical Center  
6600 Bruceville Rd  
Sacramento, Ca 95823**

***Plaintiff AZ, Minor's healthcare provider.***

This witness is qualified psychological expert and treating medical provider of Plaintiff AZ. This witness is expected to testify that, based on reasonable psychological probability, Defendant Kelly Williams Jr.'s molestation of Plaintiff AZ has caused permanent emotional and psychological trauma that has detrimentally affected his development and overall enjoyment of life. This witness is also expected to testify that, based on reasonable psychological probability, the aforementioned molestation will continue to detrimentally affect Plaintiff AZ's development and overall enjoyment of life into the future. This witness will also testify as to the future care plan and costs associated with the damages caused by the Defendant Kelly Williams's molestation of Plaintiff AZ. This witness may also testify as to the usual and customary changes associated with children with special needs that have been molested.

**Children's Medical Center of Dallas Neuropsychology  
1935 Motor Street  
Dallas, Tx 75235  
214-456-5900**

This witness is qualified psychological expert and treating medical provider of Plaintiff AZ. This witness is expected to testify that, based on reasonable psychological probability, Defendant Kelly Williams Jr.'s molestation of Plaintiff AZ has caused permanent emotional and psychological trauma that has detrimentally affected his development and overall enjoyment of life. This witness is also expected to testify that, based on reasonable psychological probability, the aforementioned molestation will continue to detrimentally affect Plaintiff AZ's development and overall enjoyment of life into the future. This witness will also testify as to the future care plan and costs associated with the damages caused by the Defendant Kelly Williams's molestation of Plaintiff AZ. This witness may also testify as to the usual and customary changes associated with children with special needs that have been molested.

**Our Children House at Baylor**  
**507 N Hwy 77 Suite 700A**  
**Waxahachie, TX 75165**

This witness is qualified psychological expert and treating medical provider of Plaintiff AZ. This witness is expected to testify that, based on reasonable psychological probability, Defendant Kelly Williams Jr.'s molestation of Plaintiff AZ has caused permanent emotional and psychological trauma that has detrimentally affected his development and overall enjoyment of life. This witness is also expected to testify that, based on reasonable psychological probability, the aforementioned molestation will continue to detrimentally affect Plaintiff AZ's development and overall enjoyment of life into the future. This witness will also testify as to the future care plan and costs associated with the damages caused by the Defendant Kelly Williams's molestation of Plaintiff AZ. This witness may also testify as to the usual and customary changes associated with children with special needs that have been molested.

**ISD Special Education Dept.**  
**1201 N. Dallas Ave**  
**Lancaster, TX 75146**

This witness is qualified psychological expert and treating medical provider of Plaintiff AZ. This witness is expected to testify that, based on reasonable psychological probability, Defendant Kelly Williams Jr.'s molestation of Plaintiff AZ has caused permanent emotional and psychological trauma that has detrimentally affected his development and overall enjoyment of life. This witness is also expected to testify that, based on reasonable psychological probability, the aforementioned molestation will continue to detrimentally affect Plaintiff AZ's development and overall enjoyment of life into the future. This witness will also testify as to the future care plan and costs associated with the damages caused by the Defendant Kelly Williams's molestation of Plaintiff AZ. These witnesses may also testify as to the usual and customary changes associated with children with special needs that have been molested.

**Dallas County Schools Autism Assessment**  
**613 North Dang Blvd**  
**Dallas, TX 75208**

This witness is qualified psychological expert and treating medical provider of Plaintiff AZ. This witness is expected to testify that, based on reasonable psychological probability, Defendant Kelly Williams Jr.'s molestation of Plaintiff AZ has caused permanent emotional and psychological trauma that has detrimentally affected his development and overall enjoyment of life. This witness is also

expected to testify that, based on reasonable psychological probability, the aforementioned molestation will continue to detrimentally affect Plaintiff AZ's development and overall enjoyment of life into the future. This witness will also testify as to the future care plan and costs associated with the damages caused by the Defendant Kelly Williams's molestation of Plaintiff AZ. These witnesses may also testify as to the usual and customary changes associated with children with special needs that have been molested.

**Christine Englert - MISD IEP (ARD) Committee - Administrator, LEA Representative**  
**Joe Stivers - MISD IEP (ARD) Committee - General Education Teacher**  
**Amy Skipper - MISD IEP (ARD) Committee - Speech Therapist**  
**Joane Brown - MISD IEP (ARD) Committee - Diagnostician**  
**Kimberly Dennis - MISD IEP (ARD) Committee - Occupational Therapist**  
**Carla Egyed - MISD IEP (ARD) Committee - LSSP**  
**Rob Balentine - MISD IEP (ARD) Committee - Administrator**  
**Christi Powell - MISD IEP (ARD) Committee - General Education Teacher**  
**Dana Beal - MISD IEP (ARD) Committee - Adapted P.E. Teacher**  
**Jessica Fincher - MISD IEP (ARD) Committee - General Education Teacher**  
**James Czerwinski - MISD IEP (ARD) Committee - Special Education Teacher - Life Skills**  
**Myatt - MISD IEP (ARD) Committee - Special Education Teacher - Life Skills**  
**Representatives, employees, and custodians of:**  
**Mansfield ISD Special Education Department**

These witnesses and other employees of Mansfield ISD participated in the Individualized Education Program committees of Plaintiffs AZ, KM and CS. The professionals, who took part in Mansfield ISD's special education process, have specialized knowledge regarding the particulars of the Plaintiffs' behaviors and emotional state before and after the incidents involving Plaintiffs. These witness may testify as to whether Plaintiffs exhibited detrimental behavioral, cognitive, and emotional changes following their respective incidents. These witnesses may also generally testify as to the usual and customary changes associated with children with special needs that have been molested.

**Leddy Fowler**  
**Detective MISD Police Department**

Participated in the Tarrant County criminal case against Defendant Kelly Williams, Jr. This witness has specialized knowledge regarding the Continuous Sexual Abuse of a Child/Children charges that were pursued against Defendant Kelly Williams, Jr.. This witness is expected to testify regarding Kelly Williams' repeated acts sexual misconduct against Mansfield ISD students, including Plaintiffs AZ, KM and CS. This witness may also testify about the ways in which Mansfield ISD's failed supervision, training and hiring practices was the moving force behind Defendant Kelly Williams'



repeated instances of sexual misconduct against Mansfield ISD students on Mansfield ISD grounds. This witness may also testify as to the usual and customary changes associated with children with special needs that have been molested. Finally, this witness may draw from her specialized knowledge regarding criminology to testify about the behaviors and propensities of criminals who typically engage in child molestation, such as Defendant Kelly Williams, Jr.

**Lee Schellinbarger**

**Detective MISD Police Department**

Participated in the Tarrant County criminal case against Defendant Kelly Williams, Jr. This witness has specialized knowledge regarding the Continuous Sexual Abuse of a Child/Children charges that were pursued against Defendant Kelly Williams, Jr.. This witness is expected to testify regarding Kelly Williams' repeated acts sexual misconduct against Mansfield ISD students, including Plaintiffs AZ, KM and CS. This witness may also testify about the ways in which Mansfield ISD's failed supervision, training and hiring practices was the moving force behind Defendant Kelly Williams' repeated instances of sexual misconduct against Mansfield ISD students on Mansfield ISD grounds. This witness may also testify as to the usual and customary changes associated with children with special needs that have been molested. Finally, this witness may draw from his specialized knowledge regarding criminology to testify about the behaviors and propensities of criminals who typically engage in child molestation, such as Defendant Kelly Williams, Jr.

**Sergeant Robert Wood**

**MISD Police Officer**

Participated in the Tarrant County criminal case against Defendant Kelly Williams, Jr. This witness has specialized knowledge regarding the Continuous Sexual Abuse of a Child/Children charges that were pursued against Defendant Kelly Williams, Jr.. This witness is expected to testify regarding Kelly Williams' repeated acts sexual misconduct against Mansfield ISD students, including Plaintiffs AZ, KM and CS. This witness may also testify about the ways in which Mansfield ISD's failed supervision, training and hiring practices was the moving force behind Defendant Kelly Williams' repeated instances of sexual misconduct against Mansfield ISD students on Mansfield ISD grounds. This witness may also testify as to the usual and customary changes associated with children with special needs that have been molested. Finally, this witness may draw from his specialized knowledge regarding criminology to testify about the behaviors and propensities of criminals who typically engage in child molestation, such as Defendant Kelly Williams, Jr.

**Kyle Gipson**  
**Criminal Investigator & Forensic Examiner**  
**Tarrant County Criminal Investigations**  
**Tarrant County District Attorney's Office**

This witness can provide expert testimony regarding the forensic examination of the defendant's computer, cell phones, SD cards and any other electronic storage devices, the methods used to examine the items, the analysis, and the evidence obtained from the seized items. This witness also has specialized knowledge regarding internet child exploitation offenses involving on-line child pornography investigations and forensic examinations as they relate to on-line child exploitation investigations. This witness is expected to testify regarding Kelly Williams' repeated acts sexual misconduct against Mansfield ISD students, including Plaintiffs AZ, KM and CS. This witness may also testify about the ways in which Mansfield ISD's failed supervision, training and hiring practices was the moving force behind Defendant Kelly Williams' repeated instances of sexual misconduct against Mansfield ISD students on Mansfield ISD grounds. This witness may also testify as to the usual and customary changes associated with children with special needs that have been molested. Finally, this witness may draw from his specialized knowledge regarding criminology to testify about the behaviors and propensities of criminals who typically engage in child molestation, such as Defendant Kelly Williams, Jr.

**Representatives, employees, and custodians of:**  
**Tarrant County District Attorney's Office**

In charge of the Tarrant County criminal case against Defendant Kelly Williams, Jr. This witness has specialized knowledge regarding the Continuous Sexual Abuse of a Child/Children charges that were pursued against Defendant Kelly Williams, Jr.. This witness is expected to testify regarding Kelly Williams' repeated acts sexual misconduct against Mansfield ISD students, including Plaintiffs AZ, KM and CS. This witness may also testify about the ways in which Mansfield ISD's failed supervision, training and hiring practices was the moving force behind Defendant Kelly Williams' repeated instances of sexual misconduct against Mansfield ISD students on Mansfield ISD grounds. This witness may also testify as to the usual and customary changes associated with children with special needs that have been molested. Finally, this witness may draw from his specialized knowledge regarding criminology to testify about the behaviors and propensities of criminals who typically engage in child molestation, such as Defendant Kelly Williams, Jr..

**Elmore Armstrong**  
**Special Agent**  
**Department of Homeland Security**  
**Homeland Security Investigations**

This witness has specialized knowledge regarding online child exploitation investigations. This witness is expected to testify regarding Kelly Williams' repeated acts sexual misconduct against Mansfield ISD students, including Plaintiffs AZ, KM and CS. This witness may also testify about the ways in which Mansfield ISD's failed supervision, training and hiring practices was the moving force behind Defendant Kelly Williams' repeated instances of sexual misconduct against Mansfield ISD students on Mansfield ISD grounds. This witness may also testify as to the usual and customary changes associated with children with special needs that have been molested. Finally, this witness may draw from his specialized knowledge regarding criminology to testify about the behaviors and propensities of criminals who typically engage in child molestation, such as Defendant Kelly Williams, Jr.

**Aisha Saleem**  
**Assistant United States Attorney**

In charge of the Federal criminal case against Defendant Kelly Williams, Jr. This witness has specialized knowledge regarding online child exploitation investigations. This witness is expected to testify regarding Kelly Williams' repeated acts sexual misconduct against Mansfield ISD students, including Plaintiffs AZ, KM and CS. This witness may also testify about the ways in which Mansfield ISD's failed supervision, training and hiring practices was the moving force behind Defendant Kelly Williams' repeated instances of sexual misconduct against Mansfield ISD students on Mansfield ISD grounds. This witness may also testify as to the usual and customary changes associated with children with special needs that have been molested. Finally, this witness may draw from his specialized knowledge regarding criminology to testify about the behaviors and propensities of criminals who typically engage in child molestation, such as Defendant Kelly Williams, Jr.

**Representatives, employees, and custodians of:**  
**The United States Attorney's Office - Northern District of Texas**  
**United States Department of Justice**

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propensities of criminals who typically engage in child molestation, such as Defendant Kelly Williams, Jr.

**Retained Expert(s)**

**Charol Shakeshaft, PhD**  
**12278 Mt. Hermon Rd.**  
**Ashland, VA 23005**

Dr. Charol Shakeshaft is Plaintiffs' retained testifying expert. Dr. Shakeshaft will testify regarding the adequacy of Defendant Mansfield ISD's policies and practices on prevention and response to the multiple instances of sexual misconduct accomplished by Defendant Kelly Williams, Jr. against Mansfield ISD students throughout his tenure of employment. Dr. Shakeshaft's conclusions and the bases for the same are contained in her Affidavit and Preliminary Expert Report ("Report"), which is attached hereto. Dr. Shakeshaft's Report also summarizes and incorporates her experience as set forth in her updated curriculum vitae, which is attached as Exhibit 1 to her Report. Dr. Shakeshaft reserves the right to supplement this designation and her conclusions as further evidence develops.